

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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January 6, 2021

BY ECF & EMAIL

Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted.

SO ORDERED:

Re: United States v. Sean Vaughn,
13 Cr. 867 (WHP)


WILLIAM H. PAULEY III
U.S.D.J.

Dear Judge Pauley:

January 7, 2020

I write to respectfully request that Mr. Sean Vaughn's conditions of supervised release be modified from home incarceration to home detention. We submit this request so that Mr. Vaughn may leave his home—with prior approval from his U.S. Probation Officer—in order to work. While the Probation Office has advised that they take no position on this request, they note that Mr. Vaughn has been compliant with the conditions imposed and has reported when necessary.

On July 21, 2020, this Court granted Mr. Vaughn's application for compassionate release subject to the following conditions, *inter alia*: the defendant shall be subject to home incarceration enforced by location monitoring until November 8, 2022; the defendant shall be confined to the residence approved by the Probation Office 24-hours per day except for emergency medical visits; and any other release from the residence must be approved by either the Probation Office or the Court upon application from defense counsel.

Since his release five and a half months ago, Mr. Vaughn has demonstrated his commitment to abiding by the Court's conditions. He has made a concerted effort to seek employment and has even secured a position as a security guard with Harvard Protection Services in Manhattan. (See Exhibit A, Employment Offer Letter). Mr. Vaughn has located other employment opportunities as well, including cleaning bus stops for JCDecaux in Flushing, New York, and being a route driver for Fresh Direct in the Bronx. For the remainder of his period of supervised release, the lesser restrictive condition of home detention will allow Mr. Vaughn to leave the home to work and financially support himself.

If the Court grants this request, Mr. Vaughn will supply his U.S. Probation Officer with his work schedule and any necessary contact information.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Mark B. Gombiner

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